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Samsung Electronics America, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LYNNE AVRAM, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA, INC.

Defendant.

Case No.: 2:11-6973 (KM)

**NOTICE OF MOTION TO FILE
DISCOVERY LETTER UNDER SEAL**

To: ECF Service List

COUNSEL:

PLEASE TAKE NOTICE that on August 3, 2015, at 10:00 a.m., or as soon as counsel may be heard, the undersigned counsel for Defendant Samsung Electronics America, Inc. shall move before the Honorable James B. Clark, III, U.S.M.J., at the Martin Luther King Building & United States Courthouse, 50 Walnut Street, Newark, New Jersey 07101 to seal Defendant's Discovery Letter, dated July 2, 2015, and related exhibits.

The undersigned relies upon the annexed Statement In Lieu of Brief. A proposed form of Order is also annexed hereto.

SQUIRE PATTON BOGGS (US) LLP

Dated: July 2, 2015

s/ Sean Neafsey
Sean Neafsey

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